

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: TROY JORDAN : CHAPTER 13
:
DEBTOR : CASE NO. 20-14596

DEBTOR'S MOTION TO DETERMINE VALUE

Debtor Troy Jordon, through her attorney Michelle Lee of Margolis Edelstein, files the foregoing Motion to Determine Value, and avers as follows:

1. Debtor Troy Jordan resides at 7 West Essex St, Lansdowne PA 19050 ("Subject Property").
2. Debtor files this motion under Rule 3012 and 11 USC 506(a) to determine the value of the Subject Property.
3. Rule 3012 implements section 11 USC 506(a) and provides that the court may "determine the value of a claim secured by a lien on property in which the estate has an interest on motion of any party in interest." FRBP 3012.
4. Debtor seeks a determination that the value of the property no more than \$176,000 based on the condition of the property. A copy of a current market analysis is attached hereto as Exhibit "A".
5. The Subject Property has flood and water damage. Debtor hired a company to seal the basement, however, the work was subpar. Debtor made a warranty claim, however, the company filed bankruptcy. Debtor is trying to mitigate further damage and make repairs.
6. An Adversary will be filed following this Motion.

For the foregoing reasons, Debtor respectfully requests that this Court enter the attached order.

Dated: 1/4/2022

Respectfully Submitted,

/s/ Michelle Lee
Michelle Lee, Esquire
Margolis Edelstein
170 S Independence Mall W Ste 400E,
Philadelphia, PA 19106